

LAW OFFICES
SCHNADER, HARRISON, SEGAL & LEWIS

SUITE 1000
1111 NINETEENTH STREET, N.W.
WASHINGTON, D. C. 20036

202-463-2900

TELECOPIER: 202-775-8741

GAF
115969
SUITE 3600
1600 MARKET STREET
PHILADELPHIA, PENNSYLVANIA 19103
215-751-2000

SUITE 3100
750 THIRD AVENUE
NEW YORK, NEW YORK 10017
212-986-5220

SUITE 1300
240 NORTH THIRD STREET
HARRISBURG, PENNSYLVANIA 17101
717-231-4000

DIRECT DIAL NUMBER

(202) 463-2966

April 8, 1988

ORIGINAL
(Red)

Mr. Michael Towle
Remedial Enforcement Officer
United States Environmental Protection Agency
PA. CERCLA Remedial Enforcement Officer
841 Chestnut Building
6th Floor
Philadelphia, PA 19107

Re: Novak Sanitary Landfill
Lehigh County, PA

Dear Mr. Towle:

As promised in my March 3, 1988 letter to you, GAF conducted a search of its archives and purchasing records to find documents relevant to the inquiry in your Agency's Section 104(e) letter. This task has been successfully completed, and enclosed are copies of the documents that have been found.

As you will see, these documents fully support GAF's position that no liquid waste from the Whitehall plant was sent to the Novak Landfill. These documents are invoices for the shipment of drums of waste solvents, resins, coatings and inks from 1977 through 1980. These invoices show that shipments were made to Simon Wrecking Company from 1977 through the first portion of 1979. Beginning in December 1979 shipments were made to HWD, Inc. You will probably note that there were a greater number of shipments in 1977 and 1980 than other years.. This is because an accumulation of drums took place in both 1976 and 1979. The larger number of invoices for 1977 and 1980 reflect the movement of the accumulated drums together with those routinely generated during these years.

I trust that these documents, together with those previously submitted, will be sufficient for you to conclude that GAF sent no liquid wastes and no hazardous substance of any kind to the Novak Landfill. Therefore, GAF should not be included as a potentially responsible party at this site. A letter confirming this from you would be greatly appreciated.

204213

Mr. Michael Towle
April 8, 1988
Page two

ORIGINAL
(Red)

If you have any questions regarding these documents
or any of those previously submitted, please contact me.

Sincerely,

Richard A. Penna

Richard A. Penna
For SCHNADER, HARRISON, SEGAL & LEWIS

Enclosure

204214